

Sep 07, 2022

SEAN F. McAVOY, CLERK

Assigned AUSA:

County of Investigation: Spokane County

Warrant for arrest of:

Ramon Alonso Delgado are incorporated herein by this reference.

AFFIDAVIT

State of Washington)
) ss
County of Spokane)

I, Shannon K. Saylor, being duly sworn, depose and state the following:

AFFIANT BACKGROUND

1. I am a Federal Agent with the United States Postal Inspection Service and have been so employed since 2006. I am currently assigned to the Seattle Division, Spokane Domicile, and am responsible for investigating controlled substance violations involving the United States Mails. In this capacity I have received specialized training in investigations involving the transmission of controlled substances or the proceeds from the sale of controlled substances through the United States mails. I have also received training on the identification of controlled substances and interdiction of controlled substances.

2. I have participated in dozens, if not hundreds, of postal inspection cases in my career, many of which have involved the interdiction of packages that

contain controlled substances. I have been the affiant on dozens, if not hundreds, of federal search warrants, during my decade-plus career as a Postal Inspector.

3. In conjunction with my official duties, your affiant has conducted an investigation into the Distribution of a Controlled Substance by Ramon Alonso Delgado as set forth herein, asserts there is probable cause to believe that Ramon Alonso Delgado has committed the crimes of Use of the U.S. Mails with Intent to Distribute the Proceeds of an Unlawful Activity, in violation of 18 U.S.C. § 1952(a)(1); Possession of a Controlled Substance with Intent to Distribute, in violation of 21 U.S.C. § 841(a)(1); Use of A Communication Facility in Committing Drug Offenses, in violation of 21 U.S.C. § 843(b); Attempt and Conspiracy, in violation of 21 U.S.C. § 846;

4. As this affidavit is being submitted for a limited purpose, I have not included all facts known by law enforcement. I only set forth facts necessary to support the issuance of the requested search warrants.

APPLICABLE LAW

5. Pursuant to 21 U.S.C. § 843(b), it is “unlawful for any person knowingly or intentionally to use any communication facility in committing or in causing or facilitating the commission of any act or acts constituting a felony under any provision of this subchapter or subchapter II of this chapter.”

6. Distribution of controlled substances, in violation of 21 U.S.C. § 841(a) constitutes “a felony under provision of this subchapter,” as cited above.

7. A “communication facility” is defined as “any and all public and private instrumentalities used or useful in the transmission of writing, signs, signals, pictures, or sounds of all kinds and includes mail, telephone, wire, radio, and all other means of communication.”

8. Pursuant to 18 U.S.C. § 1952(a)(1), it is unlawful for anyone who “travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce, with intent to: (1) distribute the proceeds of any unlawful activity; or (2) commit any crime of violence to further any unlawful activity; or (3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity.”

INVESTIGATION

9. On or about August 30, 2022, Spokane Postal Inspector Hiland was contacted by Arizona Postal Inspector Kaminski regarding a suspicious parcel inbound from Arizona to Spokane, WA. Inspector Hiland requested the SUBJECT PARCEL be sent directly to the USPIS office in Spokane, WA. Inspector Kaminski advised Spokane inspectors that the SUBJECT PARCEL was related to a parcel seized (“Seized Parcel”) on July 29, 2022, by Inspector Grow in South

Carolina that contained fentanyl. Inspector Kaminski provided a photograph of the SUBJECT PARCEL to Inspector Hiland.

10. On August 30, 2022, Inspector Hiland contacted Inspector Grow regarding the SUBJECT PARCEL and his prior parcel seizure. Inspector Grow advised Inspector Hiland that he obtained a federal warrant for the parcel and seized approximately 943 grams of fentanyl. Inspector Grow provided a photograph of the of Priority Mail Express parcel (the Seized Parcel) that he seized, along with his case number to Inspector Hiland.

11. On September 2, 2022, I observed a photograph of the SUBJECT PARCEL and a photograph of the Seized Parcel and noticed the sender's name on the SUBJECT PARCEL was "Jenifer Quintero" and "Jennifer Quintero" on the Seized Parcel. I observed the handwriting on the SUBJECT PARCEL, and the Seized Parcel appeared to be the same handwriting. I further observed that both the SUBJECT PARCEL and the Seized Parcel were mailed from the same post office in San Luis, AZ with a zip code of 85349. I contacted Inspector Kaminski who advised that he reviewed surveillance video at the San Luis AZ Post Office and confirmed that the SUBJECT PARCEL and the Seized Parcel were mailed by the same unknown female.

12. On September 2, 2022, I received the SUBJECT PARCEL in the mail. I shook the SUBJECT PARCEL and could hear what sounded like pills inside of the mailing.

13. The SUBJECT PARCEL contained the following indicators that I know from my training and experience to be consistent with parcels that contain controlled substances and/or proceeds of controlled substance trafficking:

a. The SUBJECT PARCEL was sent via Priority Mail Express with an associated tracking number. Tracking numbers allow the sender, recipient, or anyone else with the tracking number to identify the parcel's location in the mail stream at any point from mailing to delivery. I know from my training and experience that controlled substance traffickers monitor tracking for unusual activity of controlled substance parcels while they are in the mail stream. I further know that individuals receiving parcels which contain controlled substances and/or the proceeds of controlled substance trafficking are often anxious to receive the parcel and track the parcel.

b. The return address on the SUBJECT PARCEL was listed as "Jenifer Quintero 3668 Jeet Av. San Luis, AZ 85349". I researched the return address using open-source internet searches, as well as Thomson Reuters CLEAR, an online public and proprietary records database used by law enforcement and government agencies to verify names and addresses. I could not locate the return address. I

know from my training and experience that people who receive contraband through the mails rarely use their actual addresses or names.

c. The recipient address on the SUBJECT PARCEL was listed as “Alonso Delgado 621 S. Cannon St AP# 3A Spokane, Washington 99204”. I searched for the recipient address through the same databases, and I could not associate Alonso Delgado to the recipient address.

d. Also, the review of USPS records to identify the SUBJECT PARCEL showed the transaction for the SUBJECT PARCEL was completed in cash. I know from my training and experience that persons who traffic controlled substances and controlled substance proceeds through the U.S. mail often pay in cash to remain anonymous to law enforcement.

14. On September 2, 2022, I subsequently requested the assistance of a United States Board Patrol Agent and handler of K-9 dog “Kenya.” I requested the canine conduct a sniff of the SUBJECT PARCEL and four other randomly selected parcels. Agent Louck informed me that K-9 “Kenya” did not alert to the odor of controlled substances on parcel number three, which was the SUBJECT PARCEL. It is your affiant’s understanding K-9 Kenya is not specifically trained to alert to the odor of fentanyl. K-9 Kenya is certified in the detection of concealed humans and the odors of Cocaine and its derivatives, Marijuana and its derivatives, heroin and its derivatives, Methamphetamine and its derivatives, and Ecstasy.

15. On September 2, 2022, I applied for and was granted a federal search warrant to search the SUBJECT PARCEL for evidence of a crime, contraband, fruits of crime, or other items illegally possessed, and property designed for use, intended for use, or used in committing federal drug crimes, including the use of the mails to transport drugs.

16. On September 2, 2022, Inspector Jennifer Hiland and I executed the federal search warrant on the SUBJECT PARCEL. The SUBJECT PARCEL contained approximately 461 grams of a white crystalline substance which field-tested presumptive positive for methamphetamine. The suspected controlled substance was packaged inside of numerous layers of plastic bags and heat sealed, which I know to be consistent with an effort to conceal the drugs from detection by law enforcement. Additionally, the SUBJECT PARCEL contained 215 grams of light blue pills imprinted with "M" on one side and "30" on the other which field tested presumptive positive for Acetaminophen (Paracetamol). I know through training and experience that manufactured legitimate pills marked M 30 are Oxycodone Hydrochloride 30 mg and that counterfeit M 30 pills containing fentanyl are cut with Acetaminophen.

17. On September 2, 2022, I reviewed postal records that indicate that someone had set up SMS/text message alerts to track the SUBJECT PARCEL with USPS using phone number 509-219-8104 on September 1, 2022. I checked postal

records, local law enforcements records and open sources and did not find any results for the phone number. On September 2, 2022, someone set up SMS/text message alerts to track the SUBJECT PARCEL with USPS using phone number 509-390-2315. I conducted a records check using the same databases and located a postal account for Ramon A. Delgado, 621 S. Cannon St. Apt. 1, Spokane, WA 99204 associated with phone number 509-390-2315. I could not locate a Ramon A. Delgado in local law enforcement records or through Washington State Department of Licensing. On September 2, 2022, someone set up SMS/text message alerts to track the SUBJECT PARCEL with USPS using phone number 509-342-0312. I conducted a records search and did not find any results for the phone number. On September 3, 2022, someone set up SMS/text message alerts to track the SUBJECT PARCEL with USPS using phone number 509-990-9842. I conducted a records search using the same databases and learned that the phone number is associated to Jack W. Crowther, 18917 E. Riverwalk Ln. Spokane Valley, WA 99016. I know through training and experience that drug distributors often times have co-conspirators track drug parcels for them to avoid detection from law enforcement.

18. On September 3, 2022, I conducted surveillance at the 621 S. Cannon St. Spokane, WA 99204 and learned there are approximately 12 units located at complex. I observed a locked Cluster Box Unit (CBU) mailbox with a parcel

locker located on the south side of the complex. I know through training and experience that postal customers must use a key to retrieve their mail from the CBU. I further know that in order to obtain a parcel from the CBU the Postal letter carrier would need to leave a parcel locker key in the customers locked mailbox allowing the customer access to the parcel locker.

19. While conducting surveillance, I further observed 621 S. Cannon St. Apt. 3A, Spokane, WA 99204 is a small duplex that includes units 3A and 3B with parking located near the front door. I observed a silver Lexus sedan parked right in front of apartment 3A's front door with Washington license plate BUA6410. I ran the license plate through Washington State Department of Licensing, and it returned to a silver 2004 Chevy Monte Carlo registered to Rodney E. Barce. Through training and experience I know that switched license plates are most commonly associated with stolen vehicles. I further checked all vehicles registered to Rodney E. Barce through Washington State Department of Licensing and did not locate a Lexus registered to him.

20. I contacted Avista Utilities and learned that Rodney E. Barce is listed as the current subscriber to utilities at the 621 S. Cannon St. Spokane, WA 99204 as of August 10, 2022. I further checked Barce through local law enforcement records and learned that he is a confirmed gang member and there were four active officer safety alerts for him being an armed individual.

21. On September 6, 2022, at approximately 8:00 AM, I contacted Metro Post Office personnel regarding the SUBJECT PARCEL and learned that someone named Jayden Day went online to USPS.com and placed a mail hold on all mail addressed to 621 S. Cannon St. Apt 3A, Spokane, WA 99204. I further learned that Day receives mail at 621 S. Cannon St. Apt. 3A, Spokane, WA 99204 but may live in a different apartment at the complex.

22. On September 6, 2022, a plan was developed by Postal Inspectors and Spokane Police Officers to control deliver the SUBJECT PARCEL at the Metro Post Office. At approximately 4:00 PM, the SUBJECT PARCEL was scanned “available for pickup/delivered” which I know from training and experience that once the SUBJECT PARCEL is scanned, SMS/text message alerts would be sent to all of the aforementioned phone numbers tracking it.

23. Metro Post Office personnel advised me that an online Postal Service inquiry was made regarding the SUBJECT PARCEL on September 2, 2022, and provided the information to me. I reviewed the inquiry and Ramon Delgado with a phone number listed as 509-390-2315 inquired wanting to know why the SUBJECT PARCEL had not been delivered. Postal Management further informed me that they would typically look for the parcel and call the customer to advise them of the delivery status. At approximately 4:20 PM I called 509-390-2315 from the Metro Post Office phone number and asked for Ramon Delgado and

identified myself as a postal employee. A male with a thick Hispanic accent answered the phone and stated he was Ramon Delgado. I could hear several male and female voices in the background and Delgado's phone appeared to be on speaker phone. I advised Delgado that I was contacting him regarding the SUBJECT PARCEL that he inquired about online and that it was available for pickup at the Metro Post Office. Delgado asked me several times for the address of the Metro Post Office which I told him was 5511 E. Alki Ave. Spokane Valley, WA 99212. Delgado did not seem familiar with the address or the Spokane area and he asked a female to take down the address which I repeated again. I advised Delgado that the post office closed at 5:00 PM and he told me that he would pick up the SUBJECT PARCEL today.

24. A few minutes later I heard over the police radio that a male and female exited 621 S. Cannon St. Apt. 2B, Spokane, WA 99204 and got into a white Volvo SUV with another female. I continued to hear radio communications stating the Volvo was headed east bound on I90 and got off at the Broadway exit which would be the exit closest to the Metro Post Office.

25. At approximately 4:50 PM a Metro Post Office Supervisor advised me that someone was holding on the phone and was inquiring about the SUBJECT PARCEL. I picked up the phone line and a male asked me to clarify whether the SUBJECT PARCEL was available for pickup or if had already been delivered. I

advised the male that the SUBJECT PARCEL was still at the post office and available for pick up. The male thanked me and stated he would be at the post office in a few minutes to pick it up. I do not believe this was the same male I spoke to earlier that identified himself as Ramon Delgado because he did not have a Hispanic accent.

26. Moments later I heard over the police radio that the Volvo had arrived in the Metro Post Office parking lot and a male and female exited the vehicle. Moments later the male and female entered the postal lobby and rang the doorbell. I answered the door and a Hispanic male who verbally identified himself as Ramon Alonso Delgado asked for the SUBJECT PARCEL and provided tracking number EI194296905US. A white female later identified as Shyann R. Davis was with Delgado in the postal lobby. I retrieved the SUBJECT PARCEL and asked Delgado to verify his address and asked for identification. Delgado stated his address was 621 S. Cannon St. Apt. 3B, Spokane, WA 99204. I advised Delgado the apartment number on the SUBJECT PARCEL was 3A and he stated that was a mistake and it should be 3B. Delgado informed me that he recently moved to Spokane and did not have any picture identification. Delgado used his cell phone and pulled up a photograph of a birth certificate in the name of Ramon Alonso Delgado with a date of birth of 12/26/99. I explained to Delgado that I needed picture identification in order to release the package. Delgado pulled up on his cell

phone a Yuma County Jail booking photograph dated May 16, 2021, of Ramon Alonso Delgado with a date of birth of December 26, 1999, that pictured the person before me. I could see from the booking photograph that he was charged with drug offenses. Delgado told me that he was done with being in jail and moved from Arizona to Spokane. I released the SUBJECT PARCEL to Delgado and he and Davis left the lobby and walked towards the vehicle.

27. Spokane Police Officers and Postal Inspectors stopped the vehicle in the parking lot of the post office and contacted the occupants without incident. Delgado, Shyann Davis and her mother, Cheryl Davis who was the driver were detained for questioning.

28. Spokane Police Officers contacted Cheryl Davis and advised her of her Constitutional Rights which she waived verbally. Officers advised me of the following information. Cheryl Davis stated that her daughter Shyann recently began dating Delgado approximately two months ago and he moved into their apartment located at 621 S. Cannon St. Apt. 1, Spokane, WA 99204. Cheryl Davis further stated that she provided them a ride to the post office and believed that Delgado was picking up a package sent to him by his family and denied knowing the contents.

29. Spokane Police Officers and Inspectors Salter and Stinson contacted Shyann Davis and advised her of her Constitutional Rights which she waived

verbally. Inspector Salter advised me of the following information. Shyann Davis met Delgado approximately two months ago and began dating him. Delgado is associates with Jose Millan who was recently arrested while staying at 621 S. Cannon St. Apt 2B Spokane, WA 99204. Davis stated that she knew the SUBJECT PARCEL contained 1 pound of methamphetamine and 1000 pills and believed Millan had the SUBJECT PARCEL sent to Spokane in Delgado's name. Davis further stated this is the second package of drugs that Delgado has received since she met him. Davis further stated that she and Delgado smoke M30 fentanyl pills on a regular basis.

30. Spokane Police Officers, Postal Inspector Harrold and I contacted Ramon Delgado for an interview. Delgado was advised of his Constitutional Rights which he verbally waived. Delgado stated he moved to Spokane approximately two months ago from Yuma, Arizona with his friend Jose Millan, who he knows to use and deal drugs. Delgado stated approximately one week ago Millan told him that he was going to have a package delivered to 621 S. Cannon St. Apt. 3B, Spokane, WA 99204 in his (Delgado's) name but was intended for Millan. Delgado further stated that Millan had the package sent in his (Delgado's) name because Millan had warrants. Delgado stated that Millan was going to pay him \$150 for the use of his name on the SUBJECT PARCEL.

31. Delgado stated Millan provided to him the SUBJECT PARCEL's

tracking number and he tracked the package and set up SMS/text message alerts with USPS.com to receive tracking updates. Delgado admitted the SUBJECT PARCEL contained 1 pound of “clear” and “2,000” candies. Delgado clarified that he refers to “clear” as methamphetamine and “candies” as M30 fentanyl pills. Delgado denied paying for the shipment.

32. Delgado stated Millan provided to him a phone number of a Mexican male named “Chico” and stated he should communicate with him regarding the SUBJECT PARCEL. Delgado stated after Millan got arrested a few days ago he began texting and calling “Chico” regarding the SUBJECT PARCEL. Delgado showed investigators text messages in Spanish between him and phone number +52 653 166 9681 on his cell phone.

33. Delgado stated that Millan told him that a female named Sandra ordered up the drugs in the SUBJECT PARCEL and had already paid Millan for them prior to the drugs being shipped. Delgado stated that he was going to tell Sandra she still owed \$1000 before he would deliver the drugs to her. Delgado denied knowing Sandra’s last name and stated he was going to get a hold of Sandra through a homeless male who he knew as “J” or possibly “John or Johnny” who frequents the apartments located at 621 S. Cannon St. Spokane, WA 99204 which he refers to as the “Smurf apartments”. I showed Delgado a photograph of Jayden Day and Delgado stated Day lives at the “Smurf apartments” and that was not who

he was referring to as “J”. Delgado stated that he and Day were arguing about who was going to receive the SUBJECT PARCEL because Day claimed that he pre-paid Millan for the shipment. Delgado stated that he hurried to the post office to pick up the SUBJECT PARCEL before Day could try and pick it up. Delgado further stated that he did not believe Day could pick up the SUBJECT PARCEL because it was not addressed to him. Delgado admitted to smoking fentanyl pills on a regular basis. The interview was concluded at approximately 6:30 P.M.

34. Additionally, the Volvo was seized and towed to a secure lot and Delgado’s cell phone was secured at the U.S. Postal Inspection Service Office in anticipation of a search warrant.

35. Based on these facts, your affiant requests the Court issue a warrant for the arrest of Ramon Alonso Delgado a male with a date of birth of December 26, 1999, charging him with Use of the U.S. Mails with Intent to Distribute the Proceeds of an Unlawful Activity, in violation of 18 U.S.C. § 1952(a)(1); Possession of a Controlled Substance with Intent to Distribute, in violation of 21 U.S.C. § 841(a)(1); Use of A Communication Facility in Committing Drug Offenses, in violation of 21 U.S.C. § 843(b); Attempt and Conspiracy, in violation of 21 U.S.C. § 846;

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

Respectfully submitted,


Shannon K. Saylor
U.S. Postal Inspector

JAG

Sworn to telephonically and signed electronically on

~~Subscribed and sworn to before me this~~ 7th day of September 2022.





Honorable James A. Goeke
United States Magistrate Judge